

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

_____)	
UNITED STATES OF AMERICA and)	
THE STATE OF WISCONSIN,)	
)	
Plaintiffs,)	Civil Action No. 10-C-910
)	
v.)	Hon. William C. Griesbach
)	
NCR CORPORATION, et al.)	
)	
Defendants.)	
_____)	

**DECLARATION OF SEAN CARMAN FILED IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO CERTAIN DEFENDANTS' MOTION TO
RECONSIDER ORDER DENYING MOTION TO SUPPLEMENTAL THE
ADMINISTRATIVE RECORD**

I, Sean Carman, declare as follows:

1. I am a Trial Attorney in the Environmental Enforcement Section of the United States Department of Justice. I am one of the Justice Department lawyers representing the United States in this action.

2. Based on my review of the document database maintained by the United States, the following exhibits attached to the Certain Defendants' Motion to Reconsider Order Denying Motion to Supplement the Administrative Record were produced by the United States to the Certain Defendants on the following dates:

<u>Defendants' Exhibits</u>	<u>Date Produced</u>
15, 21, 25, 26, 27, 29, 32, 56, 58, 60	June 21, 2012
Exhibit 30	July 26, 2012

Exhibit 34
Exhibit 57
Exhibit 59

July 10, 2012
August 23, 2012
September 23

3. Exhibit 1 filed with this Declaration is a true and correct copy of Technical Memorandum 1, March 13, 1998, attached as an exhibit to the Agencies' Model Documentation Report and included in the Administrative Record for the Lower Fox River Site.

4. Exhibit 2 filed with this Declaration is a true and correct copy of the report entitled "Development and Application of a PCB Transport Model for the Lower Fox River, attached as an exhibit to the Model Documentation Report and included in the Administrative Record for the Lower Fox River Site.

Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2012

s/ Sean Carman
Sean Carman

CERTIFICATE OF SERVICE

I, Sean Carman certify that on October 28, 2012, the foregoing Declaration of Sean Carman was filed electronically using the Court's ECF system and automatically served through the Court's ECF system on the following:

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